

**KELLEY DRYE & WARREN LLP**

A LIMITED LIABILITY PARTNERSHIP

**1200 19<sup>th</sup> STREET, N.W.**

**SUITE 500**

**WASHINGTON, D.C. 20036**

(202) 955-9600

FACSIMILE

(202) 955-9792

www.kelleydrye.com

NEW YORK, NY

TYSONS CORNER, VA

LOS ANGELES, CA

CHICAGO, IL

STAMFORD, CT

PARSIPPANY, NJ

BRUSSELS, BELGIUM

HONG KONG

AFFILIATE OFFICES

BANGKOK, THAILAND

JAKARTA, INDONESIA

MUMBAI, INDIA

TOKYO, JAPAN

DIRECT LINE (202) 887-1257

E-MAIL: AKlein@KelleyDrye.com

Admitted in New York and New Jersey

(Admission pending in D.C.)

February 13, 2002

Mr. William Caton  
Acting Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Re: Performance Measurements and Standards for Unbundled Network  
Elements and Interconnection, CC Docket No. 01-318

Dear Mr. Caton:

Dynegy Global Communications, Inc., e.spire Communications, Inc., ITC^DeltaCom, Inc., KMC Telecom, Inc., NuVox, Inc., Talk America, Inc., and Z-Tel Communications, Inc., through their attorneys, submit the attached Joint Reply Comments in the above-referenced proceeding. As you are aware, we were unable to file these comments with the Commission yesterday through the Electronic Comment Filing System ("ECFS") since the ECFS was undergoing "unscheduled maintenance." In accordance with our conversation last evening, and your instruction at that time, we hereby file these comments electronically with the understanding that they will not be considered late filed.

Please do not hesitate to contact me if I can provide any further information regarding this filing. Thank you for your assistance in this matter.

Respectfully submitted,

Andrew M. Klein

AMK:mla

Attachment (electronically filed)